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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

(Alger, J.)

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (RCC)
ECF Case

This document relates to:

Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al., Case No. 04-CV-5970
(S.D.N.Y.)

**STIPULATION AND ORDER REGARDING SCHEDULE TO
RESPOND TO COMPLAINT CONSOLIDATED UNDER MDL 1570**

It is HEREBY STIPULATED AND AGREED, by and between Plaintiffs in the above-referenced case consolidated under 03 MDL 1570 and Defendants Jamal Barzinji and International Institute of Islamic Thought ("Defendants"), by and through their undersigned counsel, subject to the approval of the Court, as follows:

1. The Court previously approved Stipulations by and between counsel for Plaintiffs and defendant Jamal Barzinji to respond to Plaintiffs' complaint on or before March 28, 2005.
2. Currently pending before the Court are three separate motions to dismiss relating to the Defendants in other consolidated cases: (1) a motion to dismiss in *Burnett v. Al Baraka Investment and Development Group, et al.*, brought by defendants African Muslim Agency, Grove Corporate, Heritage Education Trust, International Institute of Islamic Thought, Mar-Jac Investments, Reston Investments, Safa Trust, and York Foundation; (2) a motion to dismiss in *Ashton v. Al Qaeda Islamic Army, et al.* brought by the International Institute of Islamic Thought; and (3) a motion to dismiss in *Federal Insurance Company v. Al Qaeda, et al.* brought by Iqbal Unus, Jamal Barzinji, M. Omar Ashraf, M. Yaqub Mirza, Muhammad Ashraf, and Taha Al-Alwani (the "Pending Motions"). The Court was fully briefed and heard argument on the Pending Motions on October 12 and 14, 2004, and took them under submission at that time.

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3. In the interests of judicial economy and to avoid duplicative motions involving similar allegations, it is hereby stipulated and agreed that Defendants shall have thirty (30) days from the date on which the Court decides the Pending Motions to answer or otherwise respond to Plaintiffs' complaint in the above-referenced case.

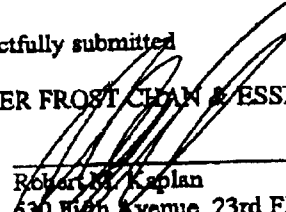
4. Plaintiffs shall have sixty (60) days from the date on which it is served with Defendants' responsive pleadings to file a response, if any. Defendants shall have twenty-one (21) days thereafter to file a reply to Plaintiffs' opposition.

5. This stipulation supersedes all previous stipulations between Plaintiffs and any Defendant.

Respectfully submitted

FERBER FROST CHAN & ESSNER, LLP

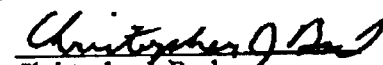
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SO ORDERED:



RICHARD CONWAY CASEY, U.S.D.J.

Dated:

May 19, 2005

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